

EXHIBIT D

Danielle Pierre

From: Danielle Pierre
Sent: Tuesday, February 2, 2021 8:21 AM
To: 'Sheldon Gopstein'
Cc: Dafney Stokes; Tabitha Luc
Subject: RE: KeyBank v. Direct Building

Mr. Gopstein,

I am happy to adjourn, however, I have sent correspondence to you previously expressing intent to schedule this deposition. As an advocate of my client's interests, I would ask for a firm date (by next week) on which I can expect to hear back from you regarding availability of your client, Direct Building, and an officer of the company.

Danielle



Danielle Pierre | Associate | Wong Fleming

821 Alexander Road, Suite 200 | Princeton, NJ 08540
Phone: 609.951.9520 | Fax: 609.951.0270

www.wongfleming.com

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From: Sheldon Gopstein <sg@gopsteinlaw.com>
Sent: Monday, February 1, 2021 4:05 PM
To: Danielle Pierre <DPierre@wongfleming.com>
Cc: Dafney Stokes <dstokes@wongfleming.com>; Tabitha Luc <tluc@wongfleming.com>
Subject: RE: KeyBank v. Direct Building

Danielle –

I have not spoken with this client in quite a while. I do not represent Mr. Deen. Let me reach out and get a status on this matter. Can you adjourn your notice for a few weeks until we sort this out? Thank you.

Sheldon Gopstein
Law Office of Sheldon H. Gopstein, Esq.

2 Park Avenue, 20th Floor
New York, NY 10016
tel. (212) 363-2400
fax (212) 363-3313
email: sg@gopsteinlaw.com
website: www.gopsteinlaw.com

From: Danielle Pierre <DPierre@wongfleming.com>
Sent: Friday, January 22, 2021 2:56 PM
To: Sheldon Gopstein <sg@gopsteinlaw.com>
Cc: Dafney Stokes <dstokes@wongfleming.com>; Tabitha Luc <tluc@wongfleming.com>
Subject: RE: KeyBank v. Direct Building

Mr. Gopstein,

On or about January 7, 2021, we mailed to your office a Notice of Deposition by electronic means to take the deposition of your clients Direct Building Products, Corp. and Yoel Deen. We intend to proceed with the deposition currently set for February 10, 2021 at 10:00 a.m. Attached please find another copy of the Notice, which I am forwarding as a courtesy.

I will be forwarding a Zoom link from Trustpoint, our teleconference provider, with to access the deposition at least 5 days prior to the examination. Please make your clients available at the set time.

Best,
Danielle



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From: Sheldon Gopstein <sg@gopsteinlaw.com>
Sent: Wednesday, December 9, 2020 10:29 PM
To: Danielle Pierre <DPierre@wongfleming.com>